

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO:</b> <i>Roberts v. Zhejiang Huahai Pharmaceutical Co. Ltd.,</i>  Case No. 1:20-cv-00946-RMB-SAK	<b>HON. RENÉE MARIE BUMB</b>

**PLAINTIFFS' NOTICE OF MOTION TO PRECLUDE OPINIONS OF  
DEFENSE EXPERT GREGORY DIETTE, M.D., M.H.S. DUE TO  
UNTIMELY DISCLOSURE**

**PLEASE TAKE NOTICE** Plaintiffs shall move before the Honorable Renée Marie Bumb, U.S.D.J., and the Honorable Thomas I. Vanaskie, Special Master, at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4th and Cooper Streets, Camden, New Jersey, for an Order Precluding the Opinions of Defense Expert Gregory Diette, M.D., M.H.S..

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs shall rely upon the Brief and Certification of Daniel A. Nigh in support of the Motion.

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

**NIGH GOLDBERG RASO  
& VAUGHN, PLLC**

Attorneys for Plaintiffs

Dated: May 22, 2025

By: /s/ Daniel A. Nigh

Daniel A. Nigh, Esq.

**NIGH GOLDBERG RASO  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 22, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to the CM/ECF participants registered to receive service in this MDL.

**NIGH GOLDENBERG RASO  
& VAUGHN, PLLC**  
Attorneys for Plaintiffs

By: /s/ Daniel A. Nigh